

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

ROBERT E. MANLEY, JR.,)	
)	
Plaintiff,)	
)	Cause No. 08 CV 1757
v.)	
)	
NORTHEAST ILLINOIS REGIONAL)	
COMMUTER RAILROAD CORP.)	
d/b/a METRA,)	
)	
Defendants.)	

PLAINTIFF'S MOTION TO EXTEND DISCOVERY DEADLINE

COMES NOW Plaintiff, Robert E. Manley, Jr., and for his Motion to Extend
Discovery Deadline, states as follows:

1. Plaintiff's Complaint was filed on March 26, 2008.
2. Defendant answered the Complaint on May 21, 2008.
3. On June 18, 2008, the Court ordered that the discovery deadline for this case
is August 29, 2008.
4. A status hearing is set in this case on September 17, 2008.
5. Trial in this matter has not been set.
6. The parties have exchanged written discovery and Rule 26(a)(1) disclosures.
7. The parties have been cooperating to proceed with discovery as quickly as
possible; however, due to schedules and other time constraints, including a trial that counsel
for Plaintiff recently tried in the Southern District of Illinois the week of July 28, 2008, the

parties have been unable to complete discovery in the approximate 70 days given by the Court to complete discovery.

8. Plaintiff requests that the discovery deadline be extended to December 1, 2008.

9. Plaintiff does not seek this extension for the purposes of delay and there will be no prejudice to the Defendant if the Court grants this short extension.

WHEREFORE, Plaintiff, Robert Manley, respectfully requests that this court enter an order extending the discovery deadline up to and including December 1, 2008 and for such other and further relief that this Court deems reasonable and just.

HOLLAND, GROVES & SCHNELLER &
STOLZE, L.L.C.

/s/ Ryan M. Furniss

RYAN M. FURNISS #6282915
ERIC D. HOLLAND #6207110
300 North Tucker, Suite. 801
St. Louis, MO 63101
(314) 241-8111
(314) 241-5554 (fax)

and

ROBERT J. COONEY, JR.
Cooney & Conway
120 N. LaSalle Street, Suite 30
Chicago, IL 60602

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing was filed via CM/ECF, on this 22nd day of August, 2008:

A. Jay Koehler
Ewa Dabrowski
Swanson, Martin & Bell, LLP.
330 North Wabash, Suite 3300
Chicago, IL 60611
Telephone: (312) 321-9100
Fax: (312) 321-0990

/s/ Ryan M. Furniss